

USDC SDNY
DOCUMENT
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DOC #: _____
DATE FILED: **MAY 14 2018**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

WILLIAM MCCALL,

Defendant.

INDICTMENT

18 Cr. ____ ()

18 CRIM 338

JUDGE SULLIVAN

COUNT ONE
(Narcotics Conspiracy)

1. From in or about January 2018 up to and including in or about March 2018, in the Southern District of New York and elsewhere, WILLIAM MCCALL, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that WILLIAM MCCALL, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances that WILLIAM MCCALL, the defendant, conspired to distribute and possess with intent to distribute were 100 grams and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(B), 500 grams and more

of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b) (1) (B), and mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b) (1) (C).

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

4. As a result of committing the controlled substance offense alleged in Count One of this Indictment, WILLIAM MCCALL, the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting and derived from any proceeds the defendant obtained, directly or indirectly, as a result of the offense and any and all property used, or intended to be used, in any manner or part, to commit and to facilitate the commission of the offense.

SUBSTITUTE ASSET PROVISION

5. If any of the above described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third person;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value;

or

(e) has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)



FOREPERSON

Geoffrey S. Berman
GEOFFREY S. BERMAN
United States Attorney

1402

5/14/18 P.D. Tash. This case is assigned
to Judge Sullivan for all purposes.

Mrs. Duke Place

Form No. USA-33s-274 (Ed. 9-25-58)

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v.

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Defendant.

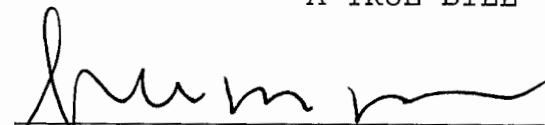
INDICTMENT

18 Cr. ____ (____)

(21 U.S.C. § 846.)

GEOFFREY S. BERMAN
United States Attorney

A TRUE BILL



Foreperson